

Donald E. J. Kilmer, Jr. [SBN: 179986]
LAW OFFICES OF DONALD KILMER
1645 Willow Street, Suite 150
San Jose, California 95125
Voice: (408) 264-8489
Fax: (408) 264-8487
E-Mail: Don@DKLawOffice.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO / OAKLAND DIVISION

MARK AARON HAYNIE, THE
CALGUNS FOUNDATION, INC.,
and THE SECOND AMENDMENT
FOUNDATION, INC.,

Plaintiffs,

vs.

KAMALA HARRIS, Attorney General
of California (in her official capacity)
and CALIFORNIA DEPARTMENT
OF JUSTICE, and DOES 1 TO 20,

Defendants.

Case No.: CV 10 1255 SI

**STIPULATION and JOINT
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES
SHOULD BE RELATED**

**ND CA Rule 7-11
ND CA Rule 3-12(b)**

IT IS HEREBY STIPULATED by and between the parties hereto through
their respective attorneys of record that a subsequent case is and ought to be
related to this action.

The subsequent case is *Richards, et al., v. Harris, et al.*, Case No.: CV-11-
2493 LB. The case was filed on May 20, 2011. A true and correct copy of the
Complaint is attached as Exhibit A. A Notice of Related Case was also filed in that
action and is attached as Exhibit B.

1 The Defendants, by and through undersigned counsel stipulate that the cases
2 are related pursuant to Local Rule 3-12.

3 The Plaintiffs, by and through undersigned counsel stipulate that the cases
4 are related pursuant to Local Rule 3-12.

5 The earlier action *Haynie, et al., v. Harris, et al.*, was set for a motion to
6 dismiss that was originally set on June 10, 2011, but which has been reset to
7 August 5, 2011 at 9:00 a.m.

8 The parties stipulated that there is not prejudice to either party or the
9 pending motion if the cases are related.

10 SO STIPULATED.

11 Date: June 1, 2011

Date: June 1, 2011

12 /s/
13 Ross Moody, Counsel for Defendant

/s/
Donald Kilmer, Counsel for Plaintiffs

14 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND**
15 **LOCAL RULE VIII.B.**

16 I, Donald Kilmer, declare under penalty of perjury under the laws of California
17 and the United States that I have in my possession e-mail correspondence from
18 Ross Moody that the content of this document is acceptable to all persons required
19 to sign the document. I declare that this document was signed in San Jose, CA on
20 June 1, 2011.

21 /s/
22 Donald Kilmer of
23 Law Offices of Donald Kilmer, APC
for Plaintiffs

FINDINGS AND ORDER

Pursuant to the stipulation of the parties and a review the Complaint in *Richards v. Harris*, Case No.: CV 11-2493 LB, and the First Amended Complaint in this action, this Court finds that the matters are related under Local Rule 3-12.

The Clerk of the Court is directed to reassign *Richards v. Harris*, Case No.: CV 11-2493 LB to the same docket as *Haynie v. Harris*, Case No.: CV 10-1255 SI. All deadlines in the *Richards* case are vacated and an Initial Case Management Conference is set for August 5, 2011 concurrently with the Case Management Conference in the *Haynie* matter.

Plaintiffs are directed to serve a copy of this Stipulation and Order on the remaining Defendants in the *Richards* case.

Date: 6/7/11



United States District Judge